

Tara Clark Newberry, Esq.
NV Bar No. 10696
Clark Newberry Law Firm
7854 W. Sahara Avenue
Las Vegas, NV 89117
Telephone: (702) 608-4232
Facsimile: (702) 946-1830
tnewberry@cnlawlv.com

Danny J. Horen
NV Bar No. 13153
Spartan Law, LLC
7854 W. Sahara Avenue
Las Vegas, NV 89117
Telephone: 702.625.1539
Facsimile: 702.548.4459
danny@spartanlaw.us

Attorneys for Plaintiff
Russell Patton

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RUSSELL PATTON,

Plaintiff,

v.

**FINANCIAL BUSINESS AND
CONSUMER SOLUTIONS, INC.
A/K/A FBCS,**

Defendants.

Case No.: 2:16-cv-02738-JCM-CWH

**[FIRST] STIPULATION TO
EXTEND PLAINTIFF'S TIME TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT**

STIPULATION

Plaintiff RUSSEL PATTON (“Plaintiff”) and Defendant FINANCIAL BUSINESS AND CONSUMER SOLUTIONS, INC. a/k/a FBCS (“Defendant”), by and through their counsel of record, hereby stipulate as follows:

1. Defendant filed a Motion for Summary Judgment on November 1, 2017. [Dkt. No. 38];
2. Plaintiff’s Response to Defendant’s Motion for Summary Judgment is currently due November 22, 2017;
3. Plaintiff deposed Defendant’s Person Most Knowledgeable on November 15, 2017;
4. Plaintiff ordered a “rush copy” of the deposition transcript, which should be available on or around November 22, 2017;
5. The parties agree that an extension of time to respond to Defendant’s Motion for Summary Judgment will allow Plaintiff to fully brief its response, including reviewing and using deposition testimony from Defendant’s Person Most Knowledgeable;
6. The proposed new deadline for Plaintiff to respond to Defendant’s Motion under this Stipulation is November 30, 2017;
7. This is the first such request to extend Plaintiff’s deadline to respond to Defendant’s Motion;
8. This request is made in good faith, with good cause, by the parties to ensure each party is afforded the opportunity to fully litigate this matter;

STIPULATION

9. This request is not made for the purpose of delay.

Date: November 15, 2017

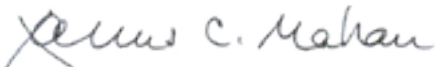
SPARTAN LAW

/s/ Danny J. Horen
Danny Horen, Esq.
7854 W. Sahara Avenue
Las Vegas, NV 89117
702.625.1539
Email danny@spartanlaw.us
Attorney for Plaintiff

MORRIS, POLICH & PURDY
(with permission)

/s/ Matthew R. Carlyon
Matthew R. Carlyon, Esq.
3800 Howard Hughes Pkwy
Ste. 500
Las Vegas, NV 89169
Email: MCarlyon@mpplaw.com
Attorneys for FBCS

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

November 16, 2017
DATED: _____

STIPULATION